

Ms. Erinn D. Larkin
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Re: Human Rights Campaign PAC (August 2008 Monthly Report)
Identification Number: C00235853

Dear Ms. Larkin:

This letter responds to your request for additional information dated October 10, 2008 regarding HRC PAC's August 2008 Monthly Report.

1. The totals listed in Line 11(a)(1) and 11(a)(ii), Column B of the Detailed Summary Page, were incorrectly reported due to an internal clerical error using the NGP software to amend the August 2008 Monthly Report on September 19, 2008. The figures stated on the originally-filed and first amended August 2008 Monthly Reports were correct. We regret the clerical error and have amended the report to reflect the correct calendar-year figures.

2 & 3. As described in our most recent correspondence, HRC PAC has established procedures consistent with the FEC's "best efforts" regulations. In response to previous letters, HRC PAC initiated a further review of its procedures in order to regularly obtain updated contributor information from recurring contributors, i.e., contributors who make monthly, quarterly or annual contributions to HRC PAC. We specifically documented these and other "best efforts" procedures in our letter dated July 7, 2008.

We appreciate the guidance chart of individual inadequate employer(s)/occupation(s) and have mailed "best efforts" letters to the individuals you identified, notifying them that the employer and/or occupation information they provided is inadequate. We also have initiated further steps to integrate your guidance into our future "best efforts" procedures. HRC PAC will amend reports or update future reports as appropriate.

4. The formal name of the political committee, "Human Rights Campaign PAC," has been corrected on the amended filing.

I hope this additional information answers your specific requests. Should you need further information, please feel free to contact me at (202) 216-1549 or Darrin Hurwitz, HRC staff counsel, at (202) 572-8914.

Sincerely,

Jim Rinefierd
Treasurer
